

Exhibit C

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MICHAEL DAVID SILLS and)	
MARY SILLS,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 3:23-cv-00478
)	
SOUTHERN BAPTIST CONVENTION,)	
a nonprofit corporation;)	
et al.,)	
)	
Defendants.)	
)	

VIDEOTAPED DEPOSITION OF ROLLAND SLADE

November 19, 2024

Reported by: T. A. Martin, CSR 3613

<p>1 I mean, I think you're getting into a question 2 of what did your lawyers tell you about the need to 3 settle with this person. 4 MS. RILEY: I am -- he is the chairman of the 5 Executive Committee. He certainly would have known and 6 had the responsibility and the fiduciary responsibility 7 to know why he is settling this claim with the person who 8 has just gotten a million dollars for the same claims. 9 Q. So my question is to you, as the chairman of the 10 Executive Committee, what is your understanding of why 11 you paid her more money? 12 A. We paid the -- we paid more money to help her 13 with her medical bills and care, because she was harmed 14 by our chatter on social media and -- yeah. 15 Q. Do you know how much you paid her? 16 A. I want -- I don't know the exact dollar amount. 17 Less than \$250,000. 18 Q. Okay. And you mentioned that other -- I think 19 you said other SBC entity had done -- had done a 20 settlement like this; is that correct? 21 A. Well, they did -- another -- another -- a 22 chairman of another SBC entity's board authorized a check 23 for a million dollars to an individual. 24 Q. It didn't go through the insurance company? 25 A. No, it did not.</p> <p style="text-align: right;">Page 82</p>	<p>1 MS. MADDUX: What is the document? 2 MS. RILEY: It is -- because I don't have the 3 Bates numbers. It's the web-page statement and the -- a 4 statement -- a PDF of the statement on the release of a 5 list of alleged abusers. 6 Q. Pastor Slade, can you tell me what the 7 screenshot is? 8 A. It's a screenshot from the May 26th release of 9 the statement -- a statement on the release of alleged -- 10 of the list of alleged abusers, the joint statement 11 between -- from myself and Dr. Willie McLaurin or Willie 12 McLaurin. 13 Q. And when was that written? 14 A. That was written in May -- it may have been the 15 26th, it may have been the 25th of 2002. 16 MS. CALLAS: '22? I think you said 2002. 17 THE WITNESS: No. I'm sorry. '22. 18 BY MS. RILEY: 19 Q. May 26, 2022? 20 A. Yes. 21 Q. And what prompted this posting? 22 A. The Guidepost report. 23 Q. Okay. And if you would, Pastor Slade, tell me 24 what this is. Or I'll tell you. It's the PDF of the 25 actual statement.</p> <p style="text-align: right;">Page 84</p>
<p>1 Q. Because I saw e-mails from Ms. Lyell where she 2 presented that to you, and you asked her several times, 3 hey, who was that, because I don't know about them. 4 My question is, did she ever supply you with 5 that information? 6 A. No. I was able to look that up. 7 Q. On your own? 8 A. Yes. 9 Q. Okay. And you did in fact confirm that? 10 A. Yes. 11 MS. RILEY: T, can you hear me? 12 MS. MADDUX: Yes. 13 MS. RILEY: Can you e-mail that document that we 14 were talking about this morning to Shannon so she can 15 pull it up? About the blockade. 16 This is the beauty of being in six states over 17 when you take a deposition. I apologize and appreciate 18 the patience. Okay. So I'll come back to that. 19 Q. All right. Do you know Bill Cook? 20 A. The name does not sound familiar. 21 Q. All right. I'm going to pass over two 22 documents, and I'm going to do a combined exhibit 23 whatever -- 24 THE REPORTER: It will be 10, Counsel. 25 (Exhibit 10 marked for identification.)</p> <p style="text-align: right;">Page 83</p>	<p>1 And will you read it and make sure that 2 everything in it is correct. That way we're not looking 3 on this tiny document. 4 A. Uh-huh. Okay. 5 Q. Okay. The title is "A statement on the release 6 of a list of alleged abuser," correct? 7 A. Yes, it is. 8 Q. Abusers. Excuse me. 9 Who wrote this? 10 A. This would have been -- would have been written 11 by our -- by staff -- public relations staff within the 12 Executive Committee. 13 Q. But you personally didn't write the words, 14 correct? 15 A. Correct. 16 Q. What was the purpose of it? 17 A. The purpose of this -- of this statement 18 releasing the list that was discovered -- okay -- because 19 there had been a demand for the release of the list. So 20 in releasing the list, this statement went ahead of that 21 release to explain the list. 22 Q. All right. You said -- did you just say that 23 the -- 24 Can you read back his last -- I just don't want 25 to misquote you in my question.</p> <p style="text-align: right;">Page 85</p>

22 (Pages 82 - 85)

1 Sills, Michael D. & Mary v. Southern Baptist Convention
2 Rolland Slade (#7028953)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Rolland Slade, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10

11 _____

12 Rolland Slade Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

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19 NOTARY PUBLIC

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